

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOHN BOYD, VERYL SWITZER, GILLAN
ALEXANDER, ROD BRADSHAW, WILBURT
HOWARD, PAT DAILEY, MELVIN ERB, and
DENNIS BROTHERS on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

AWB LIMITED and AWB (U.S.A.) LIMITED,

Defendants.

ECF CASE

No. 1:07 CV 3007 (GEL)

**DECLARATION OF TIMOTHY G. CAMERON IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
THE CONSOLIDATED CLASS ACTION COMPLAINT**

TIMOTHY G. CAMERON hereby declares as follows:

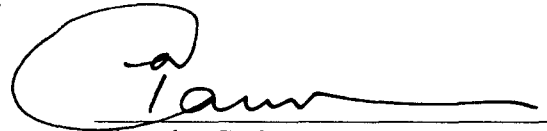
1. I am a member of the bar of the State of New York. I am also a member of the firm of Cravath, Swaine & Moore LLP, attorneys for Defendants AWB Limited and AWB (U.S.A.) Limited in this action. I submit this declaration in support of Defendants' Motion to Dismiss the Consolidated Class Action Complaint.

2. Attached hereto as Exhibit A is a true and correct copy of pages 265-279, (Chapter 3(III)(A) – IV(A)), excerpted from the report entitled Manipulation of the Oil-For-Food Programme by the Iraqi Regime, by Paul A. Volcker, Chairman, Indep. Inquiry Comm. Into the United Nations Oil-For-Food Programme, dated October 27, 2005.

3. Attached hereto as Exhibit B is a true and correct copy of the Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, DAF/IM/BR(97)20, dated November 21, 1997.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2007.



Timothy G. Cameron